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**From:** Ginelsa, Maria [Ginelsa.Maria@epa.gov]  
**Sent:** 1/8/2021 11:40:16 PM  
**To:** Chesnutt, John [Chesnutt.John@epa.gov]  
**CC:** Herrera, Angeles [Herrera.Angeles@epa.gov]  
**Subject:** RE: Hunters Point Buildings Radiological Rework

Sure, I will send out invites.

Thanks,  
Maria G

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**From:** Chesnutt, John <Chesnutt.John@epa.gov>  
**Sent:** Friday, January 8, 2021 3:29 PM  
**To:** Ginelsa, Maria <Ginelsa.Maria@epa.gov>  
**Cc:** Herrera, Angeles <Herrera.Angeles@epa.gov>  
**Subject:** RE: Hunters Point Buildings Radiological Rework

Maria,

Greg Gervais said to go for Friday Jan 15 from 1230-130 our time, and he'll call in from leave. He also told me that Dana's assistant is Lois Gartner, and that I should reach out to her next week to see if we can move the meeting up. But we should schedule it for the 15<sup>th</sup> for now.

So do you want to send out the invite from Enrique?

**Date/Time:** Friday Jan 15, 1230-130 Calif time  
**Subject:** Hunters Point Buildings Radiological Rework discussion  
**To:** Stalcup, Dana <Stalcup.Dana@epa.gov>; Gervais, Gregory <Gervais.Gregory@epa.gov>  
**Cc:** Leff, Karin <Leff.Karin@epa.gov>; Lowery, Brigid <Lowery.Brigid@epa.gov>; Libelo, Laurence <Libelo.Laurence@epa.gov>; Azad, Ava <Azad.Ava@epa.gov>; Herrera, Angeles <Herrera.Angeles@epa.gov>; Chesnutt, John <Chesnutt.John@epa.gov>; Praskins, Wayne <Praskins.Wayne@epa.gov>; Sanchez, Yolanda <Sanchez.Yolanda@epa.gov>

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**From:** Ginelsa, Maria <Ginelsa.Maria@epa.gov>  
**Sent:** Friday, January 8, 2021 1:35 PM  
**To:** Chesnutt, John <Chesnutt.John@epa.gov>  
**Cc:** Herrera, Angeles <Herrera.Angeles@epa.gov>  
**Subject:** RE: Hunters Point Buildings Radiological Rework

She has a calendar. Just bring up her calendar. I will check my old message who were here calendar person.

Thanks,  
Maria G

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**From:** Chesnutt, John <Chesnutt.John@epa.gov>  
**Sent:** Friday, January 8, 2021 1:33 PM  
**To:** Ginelsa, Maria <Ginelsa.Maria@epa.gov>  
**Cc:** Herrera, Angeles <Herrera.Angeles@epa.gov>  
**Subject:** RE: Hunters Point Buildings Radiological Rework

But do you know who to work with in Dana Stalcup's office to look into his availability??

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**From:** Ginelsa, Maria <[Ginelsa.Maria@epa.gov](mailto:Ginelsa.Maria@epa.gov)>  
**Sent:** Friday, January 8, 2021 1:31 PM  
**To:** Chesnutt, John <[Chesnutt.John@epa.gov](mailto:Chesnutt.John@epa.gov)>  
**Cc:** Herrera, Angeles <[Herrera.Angeles@epa.gov](mailto:Herrera.Angeles@epa.gov)>  
**Subject:** RE: Hunters Point Buildings Radiological Rework

Hi John,

I will send you invites to hold times and when you have final times just invite Enrique and I will delete the hold.

Thanks,  
Maria G

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**From:** Chesnutt, John <[Chesnutt.John@epa.gov](mailto:Chesnutt.John@epa.gov)>  
**Sent:** Friday, January 8, 2021 1:26 PM  
**To:** Ginelsa, Maria <[Ginelsa.Maria@epa.gov](mailto:Ginelsa.Maria@epa.gov)>  
**Cc:** Herrera, Angeles <[Herrera.Angeles@epa.gov](mailto:Herrera.Angeles@epa.gov)>  
**Subject:** FW: Hunters Point Buildings Radiological Rework  
**Importance:** High

Maria, On Dec 23 Enrique sent this email to Dana Stalcup and Greg Gervais, and at the end of the email, he said would set up a discussion with them this week. I tried to set up a meeting for next week with Enrique, Dana S, and Greg, and with everyone else on his email as optional, but Dana's calendar has no openings at all. Maybe it's blocked and we need to go through someone to schedule him. Enrique has times at 1pm on Wed and then on Thursday morning. We just need an hour.

Have you scheduled meetings with Dana S. before? Do you know if he has an assistant or someone who manages his schedule? Either way, could you help find a time next week for the 3 of them to talk for an hour regarding this topic: Hunters Pt Buildings Radiological Rework? And then include everyone else as optional. We will all find a way to participate regardless.

Thanks, John

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**From:** Manzanilla, Enrique <[Manzanilla.Enrique@epa.gov](mailto:Manzanilla.Enrique@epa.gov)>  
**Sent:** Wednesday, December 23, 2020 1:07 PM  
**To:** Stalcup, Dana <[Stalcup.Dana@epa.gov](mailto:Stalcup.Dana@epa.gov)>; Gervais, Gregory <[Gervais.Gregory@epa.gov](mailto:Gervais.Gregory@epa.gov)>  
**Cc:** Leff, Karin <[Leff.Karin@epa.gov](mailto:Leff.Karin@epa.gov)>; Lowery, Brigid <[Lowery.Brigid@epa.gov](mailto:Lowery.Brigid@epa.gov)>; Libelo, Laurence <[Libelo.Laurence@epa.gov](mailto:Libelo.Laurence@epa.gov)>; Azad, Ava <[Azad.Ava@epa.gov](mailto:Azad.Ava@epa.gov)>; Herrera, Angeles <[Herrera.Angeles@epa.gov](mailto:Herrera.Angeles@epa.gov)>; Chesnutt, John <[Chesnutt.John@epa.gov](mailto:Chesnutt.John@epa.gov)>; Praskins, Wayne <[Praskins.Wayne@epa.gov](mailto:Praskins.Wayne@epa.gov)>; Sanchez, Yolanda <[Sanchez.Yolanda@epa.gov](mailto:Sanchez.Yolanda@epa.gov)>  
**Subject:** Hunters Point Buildings Radiological Rework  
**Importance:** High

Dana and Greg,

I'm writing to update you on our efforts at the Hunters Point Naval Shipyard site (HPNS) to come to agreement with the Navy on the protectiveness of the radiological building remedial goals (RGs) included in the site RODs. Last year the Navy proposed to use RESRAD BUILD (RRB) in lieu of EPA's BPRG calculator to support their protectiveness

determinations. That initiated our radiological consultation with EPA HQ. Following that consultation, in August 2020, Region 9 relayed EPA's concerns to the Navy regarding the use of RRB, emphasizing that through our review/consultation we were unable to concur with the Navy's conclusion that the Hunters Point radiological building remedial goals are protective under CERCLA. We proposed a path forward using the BPRG calculator which would greatly lower some of the remedial goals.

The Navy sent a letter to the Region on December 11 (attached) and we responded yesterday (attached). The Navy continues to oppose the use of the BPRG calculator, claiming that EPA's proposed BPRG values for removable contamination (i.e., dust) are below background and too low to detect with state-of-the-art equipment. The Navy again requested that EPA support the Navy's RRB analysis, describing RRB as "refined, complete, and appropriate" and the "most extensively tested, verified, and validated tool used for ... radiological risk assessment."

We agree with the Navy that the BPRG calculator, when used with default inputs, generates conservative risk estimates and conservative remediation goals. For the radionuclides of concern at HPNS, the BPRG calculator estimates risks several orders of magnitude higher than RRB. We have worked with the Navy, unsuccessfully, to determine whether less conservative site-specific inputs are appropriate which would generate lower risk estimates and higher remedial goals. We have also worked with the Navy to try to resolve our concerns about their use of RRB at Hunters Point. Those efforts have also, to date, been unsuccessful.

Here's where we need your assistance in helping us prepare for further discussions and/or a formal dispute with the Navy: Given the BPRG calculator is a national tool, we need to continue close coordination with your offices as we work to resolve our differences with the Navy to ensure your interests in the BPRG calculator are represented. There are three issues that we already know we need your support with, so are elevating them to you now:

- 1) It would be helpful to know of other Superfund cleanup examples where remediation goals have been set to address radiologically-contaminated buildings for residential use (whether using BPRG, RRB, or another risk model).
- 2) We do not have a clear sense of how many times the BPRG calculator has been used to provide cleanup values at NPL sites, and the circumstances in which it has been used (e.g., radionuclides, target risk, RGs, building use). We are especially interested in examples where the planned use was residential.
- 3) We expect that one of the primary topics of discussion in a dispute will be the level of conservatism designed into the RRB and BPRG calculators for removable radiological contamination (i.e., dust) and the much higher risks estimated by the BPRG calculator. The BPRG calculator estimates risk by multiplying a contaminant concentration by four exposure factors. We encourage you to be prepared to explain the basis for the default values for these four factors, the use of the product of the four factors to estimate risk, and examples where HQ has supported site-specific modifications to the calculator to estimate risk from radiologically contaminated dust.

Thanks for your support. Let's see if we can schedule a discussion the week of January 4<sup>th</sup> hopefully when all return from well-deserved breaks.

Happy Holidays!!!

Enrique